1 2		LECTION COMMISSION E Street, N.W.	RECEIVED FEDERAL ELECTION COMMISSION
3		ngton, D.C. 20463	2015 JUL 28 PM 2: 37
4 5	FIRST GENER	AL COUNSEL'S REPORT	
6			CELA
7		MUR: 6893	
8 9		DATE COMPLAINT FILED	: October 27, 2014
10		DATE OF NOTIFICATION:	
11		LAST RESPONSE RECEIVE	
12 13		DATE ACTIVATED: March	n 24, 2015
13 14		EXPIRATION OF SOL: Oct	tober 1, 2019 (earliest)
15			tober 12, 2019 (latest)
16		ELECTION CYCLE: 2014	
17 18	COMPLAINANT:	Rand Paul for U.S. Senate 20	16
19	COM LANANI.	Rand I adi for G.S. Schate 20	10
20	RESPONDENTS:	Winning the Senate PAC and	
21	· .	in his official capacity as tre	easurer
22 23	RELEVANT STATUTES	52 U.S.C. § 30102(e)(4) ¹	
24	AND REGULATIONS:	52 U.S.C. § 30124(b)	
25	·	11 C.F.R. § 102.14(a)	
26	•	11 C.F.R. § 110.16(b)	•
27 28 29	INTERNAL REPORTS CHECKED:	Disclosure Reports	
30	FEDERAL AGENCIES CHECKED:	None	
31 32	I. INTRODUCTION		
33	Rand Paul for U.S. Senate 2016 (th	ne "Committee") alleges that Wi	nning the Senate PAC
34	("WTS"), an independent expenditure-only	y political committee, solicited i	funds in an e-mail that
35	falsely indicates that Paul and three other	U.S. Senators had sent it. The P	aul Committee
36	represents that Paul did not authorize the u	use of his name in connection wi	th WTS's solicitation
37	and is not affiliated with the entity. The C	Committee therefore contends that	at WTS fraudulently
38	misrepresented that it was writing, speaking	ng, or otherwise acting on behalf	of Paul in its e-mail
39	solicitation. WTS denies that it violated the	he fraudulent misrepresentation	provision of the Act.

On September 1, 2014, the Federal Election Campaign Act of 1971, as amended (the "Act"), was transferred from Title 2 to new Title 52 of the United States Code.

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As described below, the e-mail solicitation of WTS provided with the Complaint falsely 1 represents that it was sent "from" or on behalf of four federal candidates by name.² The e-mail 2 therefore reasonably suggests that those named federal candidates endorsed the solicitation when 3 in fact they had not — a material representation calculated to deceive a person of ordinary prudence and comprehension. Accordingly, there is reason to believe that WTS may have 5 violated 52 U.S.C. § 30124(b), the provision of the Act that proscribes fraudulently writing or 6 otherwise acting on behalf of a federal candidate in connection with a solicitation. Further, it 7 appears that WTS, an unauthorized committee, used the name of a federal candidate in the name under which it solicited funds, a violation of section 30102(e)(4) and the Commission's 9 10 implementing regulation at 11 C.F.R. § 102.14(a). Because additional fact finding is necessary to assess the scope of the apparent violations, we propose to conduct an investigation and 11

II. FACTUAL AND LEGAL ANALYSIS

A. Statement of Facts

WTS registered with the Commission on September 10, 2014, identifying itself as an independent expenditure-only political committee.³ Through the end of 2014, WTS disclosed accepting \$114,694 in contributions and making \$40,064 in independent expenditures.⁴ Its operating expenditures totaled \$64,678, the majority of which paid for website expenses, fundraising commissions, a list rental, and credit card processing fees.

recommend that the Commission authorize the use of compulsory process, as necessary.

The four named individuals were all U.S. Senate candidates at the time of WTS's October 12, 2014 e-mail. See Ted Cruz FEC Form 2, Statement of Candidacy ("SOC") (2018 Senate election) (June 17, 2014); Rand Paul SOC (2016 Senate election) (Aug. 9, 2013); Mike Lee SOC (2016 Senate election) (Oct. 4, 2011); Marco Rubio SOC (2016 Senate election) (Nov. 17, 2010).

See WTS Statement of Organization (Sept. 10, 2014).

See WTS 2014 Year End Report at 2-5 (Jan. 30, 2015). As of the date of this writing, WTS had not responded to two Requests for Additional Information of the Reports Analysis Division sent April 26, 2015.

The Complaint attaches a copy of an e-mail dated October 12, 2014, bearing the by-line "From: Cruz/Paul/Lee/Rubio (Senate)" followed by the reply address, "[mailto:stokes@ 2 winningthesenate.com]." The subject line of the e-mail states, "We know you ignored this 3 email on Friday. Take a look now." The body text, written also in the first-person plural, urges its recipient to provide "support in securing a Republican victory come November," above a 5 copy of what it describes as the "last message." That embedded e-mail message in turn contains the same by-line, "From: Cruz/Paul/Lee/Rubio (Senate)," but does not reflect a reply e-mail 7 address. The body of the embedded e-mail, again in the first-person plural, expressly solicits 8 contributions in connection with six Senate races that "will make a difference," recommending 9 that the reader "Donate \$25" for each. The e-mail ends with the statement, "Help elect 10 conservatives who will join Mike Lee, Rand Paul, Ted Cruz, Marco Rubio, and others to end our 11 national nightmare," followed by the name "T.J. Stokes, Winning the Senate." WTS's name. 12 address, and website appear at the foot of the e-mail. 10 Below that, a disclaimer states. "Paid for 13 by Winning the Senate PAC. Not authorized by any candidate or candidate's committee." The 14 e-mail also provides an internet address for WTS at www.winningthesenate.com' — the same 15

Compl., Ex.

Id.

Id. at 2. According to its filings with the Commission, WTS made \$40,064 in independent expenditures in support of three of the identified candidates and on behalf of three others not included in the e-mail. See WTS Reports of 24-Hour Independent Expenditures (Oct. 31, Nov. 3, and Dec. 2, 2014).

⁹ Id.

¹⁰ *Id*. at 3.

Id. The hard copy version of the e-mail provided with the Complaint also appears to include certain hyperlinks to a website, although the internet addresses related to those links is not visible.

domain name used in the reply-to address on the October 12, 2014, e-mail. WTS maintained a

- 2 website at that address that allowed visitors to make contributions to WTS directly. 12
- The Complaint contends that the Commission has concluded that even "merely implying
- 4 affiliation with a candidate or committee in the course of fundraising is a violation" of the
- 5 fraudulent misrepresentation provision of the Act, and that WTS "did more than that here,
- affirmatively representing to solicitation recipients that its fundraising email was 'from' Senator
- 7 Paul and others." The Complaint further represents that "Senator Paul did not authorize the use
- 8 of his name and is not affiliated with the PAC," and argues that "[a]ny 'fine print' the PAC
- 9 might have included in its fundraising email cannot paper over the fact that this solicitation was
- deliberately structured to make recipients think that Senator Paul and others were asking for their
- 11 money."14
- In its Response, WTS asserts that it retained HardenGlobal LLC in 2014 to "assist with
- an internet project to solicit contributions and make expenditures in eighteen (18) states,"
- including "launching the [WTS] website and the transmission of a series of email fundraising
- solicitations on behalf of [WTS]."15 In support of its assertions, WTS also provided the signed
- and sworn affidavit of an employee of HardenGlobal. 16 That affidavit represents that WTS

See Compl., Ex.; www.winningthesenate.com (last visited July 6, 2015). WTS's website was no longer accessible as of July 23, 2015.

Compl. at 1 (citing MUR 5472 (Republican Victory Committee, Inc.)).

¹⁴ Id. at 1-2.

Resp. at 1-2. HardenGlobal is a political consulting firm owned by Tyler Harber, who recently was sentenced to two years in prison in connection with his guilty plea to knowingly and willfully making excessive coordinated expenditures in violation of the Act and false statements to the FBI. See Judgment, United States v. Harber, Crim. No. 1:14-373 (E.D. Va. Feb. 12, 2015); Plea Agreement, United States v. Harber, supra (Feb. 12, 2015).

See Resp., Ex. A, Aff. of Andrew Ransom (May 21, 2015) ("Ransom Aff.") (HardenGlobal employee who worked on WTS fundraising).

- contracted with HardenGlobal to launch the WTS website and to "send out a series of
- 2 fundraising email solicitations for contributions to WTS."¹⁷ According to WTS, neither the e-
- mail dated October 10, 2014, nor the "re-sent" e-mail dated October 12, 2014, which was
- 4 provided with the Complaint, were distributed with the intent to mislead or confuse recipients
- 5 "into believing the email originated from any of the Senators named in the 'From' line." WTS
- states that the original e-mail generated \$9,084 in contributions and the subsequent e-mail
- 7 generated another \$16,627.¹⁹ WTS also asserts that on October 14, 2014, it received a cease and
- 8 desist letter from Senator Paul regarding the October 12 e-mail and that it complied with that
- 9 request.²⁰

- 10 B. There is Reason to Believe that WTS Fraudulently Misrepresented that a Candidate for Federal Office Sent and Endorsed its Solicitation
- 13 The Act and Commission regulations prohibit persons from "fraudulently
- misrepresent[ing] the person as speaking, writing, or otherwise acting for or on behalf of any
- candidate or political party or employee or agent thereof for the purpose of soliciting

Ransom Aff. ¶ 7; see also Resp. at 2.

Resp. at 2.

Id. at 3; Ransom Aff. ¶¶ 10, 11. Ransom attests that a verbal agreement between WTS and HardenGlobal provided that WTS would pay HardenGlobal a 15% commission for its services. See id. ¶ 10. WTS's disclosure reports reflect that it received \$114,694 in contributions, and that it paid HardenGlobal \$29,195 for "fundraising commissions." See WTS 2014 Year-End Report at 3 (total contributions), 2014 Pre-General Report at 19-20 (HardenGlobal commission payments), 2014 Post-General Report at 27 (same). If that 15% figure is accurate, then WTS may in fact have received as much as \$194,633 in contributions in connection with HardenGlobal's activities on its behalf, absent other facts.

See Resp. at 3; Ransom Aff. ¶ 14.

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contributions or donations[.]"²¹ "[A] representation is fraudulent if it was reasonably calculated

2 to deceive persons of ordinary prudence and comprehension."22

3 Here, WTS was responsible for engaging in an on-line fundraising campaign using e-mail

- 4 solicitations that expressly represented that four U.S. Senators sent the message that it was
- 5 "from" those candidates. One of those four federal candidates has now informed the
- 6 Commission through its statutory complaint procedure that he did not in fact consent to the use
- 7 of his name in connection with the solicitation in any way.²³ In addition to that express
- 8 misrepresentation concerning its source, the language of the communication was also designed to
- 9 cause its recipients to conclude that the named candidates together jointly endorsed the
- solicitation: "[l]et me know if we can count on your support;" "We're being outspent by
- Democrats;" "We are on the verge of pulling ahead."²⁴

Moreover, the misleading nature of the claim that the named candidates sent the message and endorsed the solicitation is not cured by other features of the e-mail that reflect that the funds would be received by WTS or that the named candidates did not "authorize" the solicitation.²⁵

²¹ 52 U.S.C. § 30124(b)(1); 11 C.F.R. § 110.16(b)(1).

FEC. v. Novacek, 739 F.Supp.2d 957, 961 (N.D. Tex. 2010). Cf. United States v. Thomas, 377 F.3d 232, 242 (2d Cir. 2004) (citing, inter alia, Silverman v. United States, 213 F.2d 405 (5th Cir. 1954) (holding that in a scheme devised with the intent to defraud, the fact that there is no misrepresentation of a single existing fact makes no difference in the fraudulent nature of the scheme)).

In this sense, the present matter is similar to MUR 6427 (Unknown Respondents), in which the Commission found reason to believe that unknown respondents violated section 441h(a) (recodified at 30124(a)) based also on the putative source of an e-mail that delivered a fraudulent message in the name of a federal candidate. The e-mail's "from" line in that matter stated, "From: Scott Eckersley (mailto:scott.eckersley@yahoo.com)," and the body of the e-mail was written in the first-person voice, as here. But in fact Eckersley, the candidate, had not sent the e-mail; rather it was sent by another person, as determined in the Commission's investigation.

See Compl., Ex. (emphasis added).

Specifically, the e-mail identifies WTS's domain name in its reply address "[mail to:stokes@ winningthesenate.com]," identifies the organization in the valediction "T.J. Stokes, Winning the Senate," includes a disclaimer that names WTS, and provides a physical and website address for WTS at its foot.

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MUR 6893 (Winning the Senate PAC) First General Counsel's Report Page 7 of 12

The suggestion of a U.S. Senator's endorsement of a political fundraising solicitation — indeed,

four such senators speaking in one voice — may be particularly material to the recipient of such

a request concerning the decision whether to contribute.²⁶ Presumably that is why WTS and its

agents framed the solicitation as they did. But that there is no additional misrepresentation that

the funds would be received by the candidates does nothing to lessen the materiality of the false

representation that the named candidates sent and endorsed the solicitation generally.

Likewise, the existence of a Commission-required disclaimer in this instance does not negate the deceptive nature of the message concerning the candidates' putative involvement.²⁷ The assertion that none of the named candidates may ultimately have "authorized" the communication, an otherwise undefined term, is not inconsistent with a reasonable belief that nonetheless the named candidates supported or endorsed the solicitation — especially where the communication expressly states that those candidates sent it and the solicitation is written in a voice designed to perpetuate the belief that they personally supported its message. Indeed, the Commission has previously recognized that the presence of a disclaimer will not negate intent to deceive depending upon the particular circumstances presented. In MUR 5472, the Republican Victory Committee mailings at issue contained a disclaimer, but the Commission nevertheless

The Supreme Court has held that a statement is material if it has "a natural tendency to influence, or [is] capable of influencing, the decision of the decisionmaking body to which it was addressed." *United States v. Gaudin*, 515 U.S. 506, 509 (1995).

See Compl., Ex. at 3. If the solicitation e-mail was sent to more than 500 recipients, it required a disclaimer within a box. See 52 U.S.C. § 30120(a), (c)(2); 11 C.F.R. § 110.11(a)(1), (c)(2)(ii). The photocopy of the e-mail attached to the Complaint does not reflect that the disclaimer language was placed within a box, but it is not clear whether the attached copy retains the original electronic formatting of the e-mail. See Compl., Ex. In fact, the copy of the original earlier e-mail submitted by WTS shows the disclaimer within two lines, though not in a box. See Resp., Ex. B. Thus, we make no recommendation as to this issue.

18.

found that respondents knowingly and willfully violated section 441h(b) (recodified at section 30124(b)).²⁸

This matter is readily distinguishable from others in which the Commission has declined to proceed on a fraudulent misrepresentation theory. For instance, in MURs 6633, 6641, 6643, 6645, the Commission recently found no reason to believe that a series of unauthorized entities purporting to raise funds on behalf of congressional candidate Allen West fraudulently misrepresented that they were acting on West's behalf. In those cases, however, the solicitations did not falsely suggest that West himself sent or endorsed the solicitation. The circumstances here also differ from those in MUR 5853 (Roth for Congress). In MUR 5853, the Commission found no reason to believe an individual violated section 441h(a) (recodified at section 30124(a)) by disseminating a satirical letter purportedly written by the candidate, but that obviously was not. Unlike that matter, the message of the solicitation here appears in earnest and, taken as a whole, to be designed to convey that the named candidates sent it or at least endorsed the message.

We also find uncompelling, particularly at this initial stage of the Commission's proceedings, WTS's assertion in its Response that it did not intend to mislead or confuse recipients into believing that the "from" line of the e-mail meant what it said. This post-hoc assertion concerning the organization's then-existing subjective intent appears inconsistent with the objective manifestation of its intent reflected in the express language of the solicitation and the message it apparently was designed to convey.

See Factual & Legal Analysis at 4 n.2, 9, 11, MUR 5472.

See Resp. at 2; Ransom Aff. ¶ 9.

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Thus, taking the communication as a whole, we conclude that a reasonable person would believe that the four senators named as the solicitation's source at the very least endorsed the solicitation. And by crafting its solicitation to falsely represent that material fact, WTS fraudulently misrepresented that it was "speaking, writing, or otherwise acting for or on behalf of" Paul and the other named federal candidates "for the purpose of soliciting contributions or donations."

While the Response provides information about the amount of contributions raised as a result of this particular fraudulent e-mail solicitation, we do not know the full scope of WTS's activities. WTS acknowledges that its fundraising campaign involved a solicitation effort that spanned 18 states, and a representative of its vendor, HardenGlobal, confirms that the vendor was retained to circulate "a series of fundraising email solicitations for contributions to WTS."

WTS also states that it raised \$16,627 from the e-mail provided with the Complaint and \$9,084 from the original e-mail it had sent two days before, for a total of \$25,711. WTS has reported total contributions of \$114,694, however, suggesting additional likely solicitations. Moreover, the public record reveals that WTS may have sent other e-mail solicitations at around the same time that also similarly conveyed, apparently falsely, that they were "from" a named federal candidate who endorsed the solicitation. 33

The Commission was previously unable to reach fraudulent misrepresentations of campaign authority relating to the claimed false endorsement of a solicitation. See, e.g., MUR 148 (Ford); MUR 227 (Bellmon). In 2002, however, in response to the Commission's recommendation, Congress amended the Act to reach persons who fraudulently speak, write, or otherwise act on behalf of a federal candidate for the purpose of soliciting contributions. See Bipartisan Campaign Reform Act of 2002 Sec. 309, 116 Stat. 104; 147 CONG. REC. S3122 (daily ed. Mar. 29, 2001) (Statement of Sen. Nelson).

Ransom Aff. ¶ 7:

³² Resp. at 3.

See Attach. 1, http://le.utah.gov/publicweb/menu.jsp (publicly available on-line catalog of the State of Utah legislature that provides copies of e-mails received from the public).

further relevant information.

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For all of these reasons, it appears that the fraudulent solicitation activities of WTS may
have extended beyond the single e-mail solicitation attached to the Complaint. Consequently,
the matter warrants additional administrative fact finding to determine the full scope of WTS's
fraudulent misrepresentation of campaign authority in its solicitation practices.³⁴ We therefore
recommend that the Commission find reason to believe that WTS violated 52 U.S.C. § 30124(b),
commence an investigation, and approve compulsory process to the extent necessary to obtain

C. There is Reason to Believe WTS Violated the Act and Regulation on the Use of Candidate Names in Solicitations and Other Communications

The Act also expressly prohibits an unauthorized committee from including the name of any candidate in its name.³⁵ The Commission's regulations explain that a committee's "name' includes any name under which a committee conducts activities, such as solicitations or other communications, including a special project name or other designation."³⁶ The Commission has stated that the purpose of the prohibition is to "minimiz[e] the possibility of fraud and abuse" that may occur when an unauthorized committee raises funds through such activities, including special project names, on behalf of itself rather than the named candidate.³⁷

See Statement of Policy Regarding Commission Action in Matters at the Initial Stage in the Enforcement Process, 72 Fed. Reg. 12,545 (Mar. 16, 2007) ("The Commission will find 'reason to believe' in cases where the available evidence in the matter is at least sufficient to warrant conducting an investigation, and where the seriousness of the alleged violation warrants either further investigation or immediate conciliation."); MUR 5951 (Californians for Change f/k/a Californians for Obama) (Commission investigated section 441h(b) scheme involving unauthorized committee and related individual); MUR 5472 (Republican Victory Committee) (Commission investigated section 441h(b) scheme involving individual and related corporations).

³⁵ 52 U.S.C. § 30102(e)(4).

³⁶ 11 C.F.R. § 102.14(a).

Explanation and Justification for Special Fundraising Projects and Other Use of Candidate Names by Unauthorized Committees, 57 Fed. Reg. 31,424, 31,425 (July 15, 1992) ("1992 E&J").

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WTS, an unauthorized committee, distributed an e-mail soliciting contributions using the

- 2 names of four candidates, one of whom has represented that he did not authorize the use of his
- 3 name in the solicitation. The regulation expressly prohibits including a candidate name in the
- 4 name under which an unauthorized committee conducts "solicitations and other
- 5 communications." Thus, WTS's dissemination of an e-mail "from" four named candidates
- 6 specifically soliciting contributions in their names to that unauthorized committee would violate
- 7 the prohibition.³⁹ And although the communication at issue here contains a disclaimer, when it
- 8 promulgated the regulation the Commission expressly rejected the theory that a disclaimer would
- 9 be sufficient to cure the specific concerns that the regulation was promulgated to address.⁴⁰
- 10 Accordingly, we recommend that the Commission find reason to believe that Winning the Senate
- 11 PAC violated 52 U.S.C. § 30102(e)(4) and 11 C.F.R. § 102.14(a).

12 III. INVESTIGATION

To determine the scope of the dissemination and the cost of the activity, we propose to seek further information from WTS, including copies of other WTS solicitations. We intend to seek to obtain the information informally but request that the Commission approve compulsory process, as needed.

IV. RECOMMENDATIONS

1. Find reason to believe that Winning the Senate PAC and Jason F. Emert in his official capacity as treasurer violated 52 U.S.C. § 30124(b);

³⁸ See 11 C.F.R. § 102.14(a).

Id. WTS's use of candidate names in the text of its e-mails is not restricted by the name prohibition in the Act and regulations. Explanation and Justification for Special Fundraising Projects and Other Use of Candidate Names by Unauthorized Committees, 59 Fed. Reg. 17,267, 17,268 (Apr. 12, 1994).

See 1992 E&J at 31,424-25 (explaining that the presence of a disclaimer may not be effective to minimize the potential for confusion); accord Factual & Legal Analysis, MUR 5951 (Californians for Change f/k/a Californians for Obama) (finding reason to believe Respondent impermissibly used candidate's name even though its website contained partial disclaimer identifying Respondent).

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- 2. Find reason to believe that Winning the Senate PAC and Jason F. Emert in his official capacity as treasurer violated 52 U.S.C. § 30102(e)(4) and 11 C.F.R. § 102.14(a);
- 3: Approve the attached Factual and Legal Analysis;
- 4. Authorize the use of compulsory process, including the issuance of appropriate interrogatories, document subpoenas, and deposition subpoenas, as necessary; and
- Approve the appropriate letters. 5.

July 28, 2015

Petalas by M

Daniel A. Petalas

Associate General Counsel for Enforcement

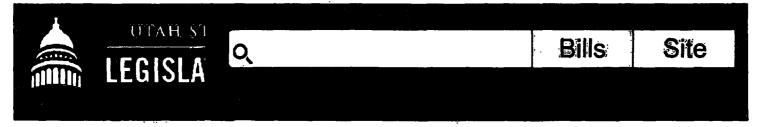
Mark Allen

Assistant General Counsel

Elena Paoli Attorney

Attachments

1. Utah State Legislature Website Material



From: Peggy Denna

To: Todd Weiler, Ralph Okerlund, Lyle Hillyard, Kevin Van Tassell, David Hinkins, Evan Vickers,

Subject: FW: Needs Your Signature and Input ASAP

Date: Wed Sep 10 08;22:05 MDT 2014

Body:

From: peggyden@msn.com

To: wharper@le.utah.gov; dhenderson@le.utah.gov; bshiozawa@le.utah.gov; wniederhauser@le.utah.gov;

aosmond@le.utah.gov; hstephenson@le.utah.gov Subject: FW: Needs Your Signature and Input ASAP

Date: Wed, 10 Sep 2014 02:01:14 -0600

Dear Senator:
I want to share this e-mail.
Thank you for your time.
Mrs. Peggy Denna

Date: Tue, 9 Sep 2014 13:00:41 -0700 From: mikelee@winningthesenate.com

To: peggyden@msn.com

Subject: Needs Your Signature and Input ASAP

How important do you think Winning The Senate is to YOUR future and the direction of OUR nation?

The Republican Party is always at its best when we are the party of big, diverse ideas and principled, passionate debate.

Real Republican leadership encourages vibrant discussion of the country's most significant challenges. And while we should never stop challenging each other, the time for unity is now:

Amnesty. Obamacare. Income Tax. Entitlements. ISIS. Oil. Judicial appointees.

Critical issues like these hang in the balance, and the upcoming election cycle will determine the direction of our country for years to come.

What issue is most important to you?

I have always believed that what divides us is nothing compared to our shared American

Attachment of 3

principles.

That is why I am proud to support the new Republican initiative. Winning The Senate, an organization exclusively dedicated to securing a majority in the United States Senate.

Winning The Senate is a banner under which all Republicans can unite, and together, we can take the Majority Leader's gavel from the destructive hands of Harry Reid.

Adding your name and support to our effort will help attract much needed financial assistance and media attention to races that will decide which party sets Washington's priorities.

Will you commit to Winning The Senate today?

Republicans have a positive agenda that will create upward mobility for poor and create real opportunity for the middle-class.

The ONLY way we can enact that agenda is by Winning the Senate.

Raise your voice and join that effort by signing the Winning the Senate pledge today.

Join me in the vital effort of winning the senate this November so that we can start the new year with a new Senate and a new agenda that will unite and lift every American.

Mike Lee United States Senator, Utah

P.S. <u>Stay updated with this game changing initiative</u>, and commit to ousting <u>Harry Reid this</u> <u>November</u>.



Winning The Senate PAC 822 King Street Box 106 | Alexandria, VA 22314 www.WinningTheSenate.com | Info@WinningTheSenate.com unsubscribe from this email list Share With A Friend

Paid for By Winning The Senate PAC. Not Authorized by any Candidate or Candidate's Committee.

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Attachment 3 of 3